

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	Case No.:	24-00059
)		
Keith D. Freeman)	Chapter:	Chapter 13
)		
Debtors)	Judge:	Hon. Donald R. Cassling

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on **April 9, 2024 at 9:30 a.m.**, I will appear before the Honorable Donald R. Cassling, or any judge sitting in that judge's place, **either** in Courtroom 619 of the Dirksen Federal Courthouse, 219 S. Dearborn St., Chicago, IL 60604 **or** electronically as described below, and present Geraci Law L.L.C.'s Motion to Withdraw as Attorney, a copy of which is attached.

Important: Only parties and their counsel may appear for the presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 414 7941 and the passcode is 619. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

By: /s/ Nathan E. Curtis
Nathan E. Curtis
Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
312.332.1800
ndil@geracilaw.com

CERTIFICATE OF SERVICE

I, Nathan E. Curtis, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on April 1, 2024.

/s/ Nathan E. Curtis
Nathan E. Curtis

LIST OF PARTIES SERVED

Via ECF

Chapter 7 Trustee, Michael Desmond

Office of the U.S. Trustee

Via US Postal Service

Keith D. Freeman, 9560 140th Ct # 301, Orland Park, IL 60462

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

Keith Douglas Freeman
9560 140th Ct #301
Orland Park, IL 60462

Affirm Inc
Attn: Bankruptcy Dept.
650 CALIFORNIA ST FL 12
SAN FRANCISCO CA 94108

Amex
Attn: Bankruptcy Dept.
PO BOX 297871
FORT LAUDERDALE FL 33329

Bridgecrest
Attn: Bankruptcy Dept.
7300 E HAMPTON AVE
MESA AZ 85209

Caine & Weiner
Attn: Bankruptcy Dept.
PO BOX 55848
SHERMAN OAKS CA 91413

Capital One
Attn: Bankruptcy Dept.
PO BOX 31293
SALT LAKE CITY UT 84131

Capital One
Attn: Bankruptcy Dept.
PO BOX 31293
SALT LAKE CITY UT 84131

Clerk, Fifth Mun. Div.
23M5005652
10220 S. 76th Ave., #121
Bridgeview IL 60455

Blitt and Gaines, PC
Bankruptcy Dept.
775 Corporate Woods Parkway
Vernon Hills IL 60061

Carmax Auto Finance
Attn: Bankruptcy Dept.
12800 TUCKAHOE CREEK PKW
RICHMOND VA 23238

Credit Collection Serv
Attn: Bankruptcy Dept.
725 CANTON ST
NORWOOD MA 02062

Discover Bank
Attn: Bankruptcy Dept.
PO BOX 30939
SALT LAKE CITY UT 84130

Greater Chicago Finance
Bankruptcy Department
8331 W. Roosevelt
Forest Park IL 60130

DuPage County Circuit Court
16SC003410
505 County Farm Road P.O. Box 707
Wheaton IL 60187

Markoff Law LLC
Bankruptcy Dept.
29 N Upper Wacker Dr # 1010
Chicago IL 60606

Illinois Department of Revenue
Bankruptcy Department
PO Box 19035
Springfield IL 62794

Illinois State Toll Hwy Auth
Attn: Legal Dept - Bob Lane
2700 Ogden Ave.
Downers Grove IL 60515-1703

IRS Non-Priority
Centralized Insolvency Operation
PO Box 7346
Philadelphia PA 19101

IRS Priority Debt
Centralized Insolvency Operation
PO Box 7346
Philadelphia PA 19101

Jefferson Capital Syst
Attn: Bankruptcy Dept.
16 MCLELAND RD
SAINT CLOUD MN 56303

Lendingpoint Llc
Attn: Bankruptcy Dept.
1201 ROBERTS BLVD NW STE
KENNESAW GA 30144

Rodzilla Prroperties
4700-40 W. 147th St, LLC
4722 147th St
Crestwood IL 60445

Clerk, Sixth Mun Div
22M65050
16501 S. Kedzie
Markham IL 60426

Stephen Dine
Bankruptcy Department
9742 S Utica
Evergreen Park IL 60805

Small Business Administration
Bankruptcy Department
801 Tom Martin Dr., Ste. 201
Birmingham AL 35211-6424

Td Bank Usa/Targetcred
Attn: Bankruptcy Dept.
PO BOX 673
MINNEAPOLIS MN 55440

Upgrade Inc
Attn: Bankruptcy Dept.
275 BATTERY ST FL 23
SAN FRANCISCO CA 94111

Verizon Wireless
Attn: Bankruptcy Dept.
PO BOX 650051
DALLAS TX 75265

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In Re:)	Case No.:	24-00059
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Keith D. Freeman)	Chapter:	Chapter 13
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MOTION TO WITHDRAW AS ATTORNEY

Geraci Law L.L.C., attorney for the debtors, in support of its Motion to Withdraw as Attorney pursuant to Local Bankruptcy Rule 2091-1, states to the Court as follows:

1. The court has jurisdiction over this proceeding under 28 U.S.C. Section 1334(b).
2. This is a core proceeding pursuant to 28 U.S.C. 157(b)(2)(A).
3. The debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code on 1/3/2024.
4. Irreconcilable differences have arisen between attorney and the debtor rendering further representation impossible.

WHEREFORE, attorney requests that the Court enter an order allowing them as attorney to withdraw from this case, and grant attorney such relief as is just and proper.

Respectfully submitted,

/s/ Nathan E. Curtis
Nathan E. Curtis

Attorneys for the Debtors

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960